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MEMORANDUM ENDORSED

November 3, 2021

By ECF

The Honorable Gregory H. Woods
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Hector Cartagena
11 Cr. 267 (GHW)

Dear Judge Woods:

I am CJA counsel to Hector Cartagena, and write pursuant to 18 U.S.C. § 3583(e)(2) to respectfully request a modification to the conditions of Mr. Cartagena's supervised release. This modification, if allowed, would permit Mr. Cartagena to engage in work-related travel outside of designated districts without seeking prior approval from Probation. The other terms of his supervised release would not be affected.

As Your Honor may recall, we recently filed a motion to terminate Mr. Cartagena's supervised release. The bases for that motion were set out in Mr. Cartagena's September 24, 2021 letter requesting early termination of supervised release (Dkt. 23), attached as Exhibit A. In denying that motion, the Court noted that "the impediment to [Mr. Cartagena's] employment identified here might be addressed without terminating [Mr. Cartagena's] supervised release." (See Memo Endorsement, Dkt. 24, at 4, attached as Exhibit B.) We are following up on that endorsement to request that Your Honor amend the terms of Mr. Cartagena's supervised release to permit him to undertake work-related travel within the United States without prior notice to or permission from Probation.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 11/4/2021

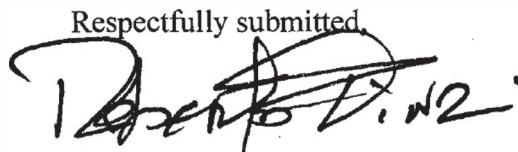
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The Honorable Gregory H. Woods

2

As noted in the motion to terminate, AUSA Rebecca Mermelstein, the Chief of the General Crimes Unit, has informed us that the Government does not object to a modification of the conditions of Mr. Cartagena's supervised release to allow him to travel outside the designated districts without prior approval from Probation. Consistent with their practice, DNJ Probation took no position with respect to Mr. Cartagena's prior motion. We have shared this motion with both AUSA Mermelstein and Mr. Cartagena's Supervisory U.S. Probation Officer Elisa Martinez, and neither the USAO nor DNJ Probation objects to the relief requested.

For the foregoing reasons, we respectfully request that the Court order that the conditions of Mr. Cartagena's supervised release be modified such that Mr. Cartagena may engage in work-related travel outside of the designated districts without prior notice to or approval from Probation.

Respectfully submitted,

Roberto Finzi

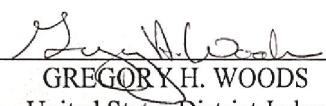
cc: U.S.P.O. Brendan Murillo (By email)
AUSA Rebecca Mermelstein (By email)

Application granted. The standard condition of supervised release requiring that Mr. Cartagena not leave the district without the permission of the court or probation officer is modified as follows: Mr. Cartagena may leave the district without the permission of the court or probation officer as required for work. Prior to any departure from the district, Mr. Cartagena is directed to notify the probation office regarding his travel and to provide an itinerary for it, including accurate contact information, the duration of his travel, and the location of his place of employment and residence during his period of employment outside of the district. Mr. Cartagena must provide prompt notice to probation of any change in this information. For the avoidance of doubt, this modification permits only travel for work. No deviations are permitted. Except as expressly modified herein, the terms and conditions of Mr. Cartagena's supervised release remain in full force and effect.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 25.

SO ORDERED.

Dated: November 4, 2021
New York, New York


GREGORY H. WOODS
United States District Judge